

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION**

UNITED STATES OF AMERICA

PLAINTIFF

V.

CASE NO. 4:15cv00181 JM

**UNITED PAIN CARE, LTD.
d/b/a UNITED PHARMACY and
MAHMOOD AHMAD, M.D.**

DEFENDANT

JOINT RULE 26(f) REPORT

Comes now the plaintiff, the United States of America, and the defendants, United Pain Care, Ltd. d/b/a United Pharmacy and Mahmood Ahmad, M.D., and for their joint Rule 26(f) Report set forth the following:

1. Any change in timing, form, or requirement of mandatory disclosures under Fed. R. Civ. P. 26(a).

The parties have agreed that mandatory initial disclosures will be postmarked or exchanged via electronic mail no later than July 31, 2015.

2. Date when mandatory disclosures were or will be made.

The parties stipulate that they will make the mandatory initial disclosures by July 31, 2015.

3. Subjects on which discovery may be needed.

Plaintiff and defendants will conduct routine discovery in regard to all of the issues in the case.

4. Whether any party will likely be requested to disclose or produce information from electronic or computer-based media.

(a) whether disclosure or production will be limited to data reasonably available to the parties in the ordinary course of business;

(b) the anticipated scope, cost and time required for disclosure or production of data beyond what is reasonably available to the parties in the ordinary course of business;

(c) the format and media agreed to by the parties for the production of such data as well as agreed procedures for such production;

(d) whether reasonable measures have been taken to preserve potentially discoverable data from alteration or destruction in the ordinary course of business or otherwise;

(e) other problems which the parties anticipate may arise in connection with electronic or computer-based discovery.

The parties may be requested to disclose or produce information from electronic or computer-based media:

(a) Disclosure or production will be limited to data reasonably available to the parties in the ordinary course of business;

(b) The scope, cost and time required for disclosure or production of data beyond what is reasonably available to the parties in the ordinary course of business is unknown at this time;

(c) The format and media agreed to by the parties for the production of such data, as well as agreed procedures for such production, include paper files and computer-based files;

(d) Reasonable measures have been taken to preserve potentially discoverable data from alteration or destruction in the ordinary course of business.

(e) Other problems in connection with electronic or computer-based discovery, if any, are unknown at this time.

5. Date by which discovery should be completed.

January 18, 2016.

6. Any needed changes in limitations imposed by the Federal Rules of Civil Procedure.

None at this time other than what is previously stated.

7. Any Orders, e.g., protective orders, which should be entered.

The parties will negotiate and agree to a protective order as necessary. If an agreement cannot be reached, a request will be made to this Court.

8. Any objections to initial disclosures on the ground that mandatory disclosures are not appropriate in the circumstances of the action.

None.

9. Any objections to the proposed trial date.

This case is currently set for a jury trial April 25, 2016. Neither party has an objection to the trial date.

10. Proposed deadline for joining other parties and amending the pleadings.

December 17, 2015.

11. Proposed deadline for completing discovery.

January 18, 2016.

12. Proposed deadline for filing motions other than motions for class certification.

The parties agree to the deadlines set forth in the Final Scheduling Order as to motion deadlines.

13. Class certification.

Not applicable.

Respectfully submitted,

For the Plaintiff

CHRISTOPHER R. THYER
United States Attorney

By /s/ Shannon S. Smith
SHANNON S. SMITH
Assistant United States Attorney
Eastern District of Arkansas
Arkansas Bar No. 94172
425 West Capitol Avenue
P.O. Box 1229
Little Rock, Arkansas 72203-1229
Telephone: (501) 340-2600
Facsimile: (501) 340-2730
shannon.smith@usdoj.gov

For the Defendants

By /s/ Timothy O. Dudley

TIMOTHY O. DUDLEY

Arkansas Bar No. 82055

114 South Pulaski Street

Little Rock, Arkansas 72201

(502) 372-0080

todudley@swbell.net